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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RH KIDS, LLC, a California limited liability company,

Plaintiff,

vs.

QUALITY LOAN SERVICE CORPORATION, an Arizona corporation; SPECIALIZED LOAN SERVICING, LLC, a Delaware limited liability company; RADAN HOLDINGS, LLC, a Nevada limited liability company; DOES I through X, inclusive,

Defendants.

Case No.: 2:22-cv-00954-APG-NJK

STIPULATION AND ORDER TO STAY PROCEEDINGS AND DEADLINES RELATED TO MOTION TO DISMISS [ECF 28] AND MOTION TO EXPUNGE LIS PENDENS [ECF 29] PENDING RESOLUTION OF RENEWED MOTION TO REMAND [ECF 27]

Pursuant to Local Rules LR 7-1, the undersigned parties hereby stipulate and agree to continue/stay the proceedings and deadlines related to Motion to Dismiss [ECF 28] and Motion to Expunge Lis Pendens [ECF 29] pending resolution of Renewed Motion to Remand [ECF 27] as set forth more fully below. Because there will be no hardship by any of the parties and in the interest of judicial economy, counsel for the parties agree and stipulate to continue/stay the proceedings and deadlines related to Motion to Dismiss [ECF 28] and Motion to Expunge Lis Pendens [ECF 29] pending the resolution of Renewed Motion to Remand [ECF 27].

1. On July 18, 2022, Plaintiff, RH Kids LLC (“Plaintiff”), filed its Renewed Motion to

1 Remand [ECF 27].

2 2. On July 28, 2022, Defendants, National Default Servicing Corporation and
3 Specialized Loan Servicing LLC (collectively “Defendants”), filed their Motion to Dismiss [ECF
4 28] and Motion to Expunge Lis Pendens [ECF 29].

5 3. On August 1, 2022, Defendants filed their Response to Motion to Remand [ECF 30].

6 4. On August 8, 2022, Plaintiff filed its Reply to Response to Motion to Remand
7 [ECF 31]. Thus, Plaintiff’s Motion to Remand [ECF 27] has ben fully briefed.

8 5. The present deadline for Plaintiff’s Responses to Motion to Dismiss [ECF 28] and
9 Motion to Expunge Lis Pendens [ECF 29] is August 11, 2022.

10 6. Defendant, Radan Holdings, LLC (“Radan”), has not filed a responsive pleading or
11 any other response to the Amended Complaint [ECF 24] as it has not yet been served the
12 Summons and Amended Complaint. Thus, acquiescence of Defendant, Radan, to this
13 stipulation is unnecessary.

14 7. Based on the agreement of counsel, the Parties hereby stipulate and agree that:

- 15 • all proceedings, including deadlines for Responses (which are presently due on
16 August 11, 2022) , related to the Motion to Dismiss [ECF 28] and Motion to Expunge
17 Lis Pendens [ECF 29] be stayed until fourteen (14) days after the Court issues its
18 order either granting or denying the Motion to Remand [ECF 27]. If the Court denies
19 the Motion to Remand [ECF 27], the Reponses to the Motion to Dismiss [ECF 28]
20 and Motion to Expunge [ECF 29] shall be filed within fourteen (14) days after the
21 Court issues its order.

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8. The parties enter this stipulation in good faith and not out of a desire to harass or delay the litigation of this action.

IT IS SO AGREED AND STIPULATED.

DATED this 10th day of August, 2022.

/s/ Krista J. Nielson

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IT IS SO ORDERED



UNITED STATES DISTRICT JUDGE

Dated: August 11, 2022